



North Carolina Department of Environment and Natural Resources  
Division of Air Quality

Beverly Eaves Perdue  
Governor

Sheila C. Holman  
Director

Dee Freeman  
Secretary

April 13, 2011

Gwen Keyes Fleming  
Regional Administrator  
USEPA Region 4  
Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960

Dear Ms. Fleming:

I am pleased to submit the Section 110(a)(1) Maintenance Plan for the 1997 8-Hour Ozone Standard for Greensboro/Winston-Salem/High Point 1-Hour Ozone Maintenance Area. Enclosed is one hard copy of the complete package containing the Section 110(a)(1) maintenance plan, as well as the supporting documentation as to how the emission estimates were developed and an exact duplicate electronic copy on compact disk. Additionally, the disk includes the MOVES model input and output files.

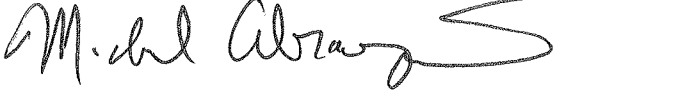
The opportunity to request a public hearing, in accordance with 40 CFR 51.102, and the public comment period were noticed in the local newspapers on Wednesday March 2, 2011. The public comment period was open from Wednesday, March 2, 2011 through Friday, April 1, 2011. There were no written requests for a public hearing and the only comments received were from the USEPA.

In addition to addressing the USEPA's comments on the pre-hearing draft submittal, a few additional changes were made in the final submittal. First an error was found in the point source documentation. Some facility emissions were reported in pounds per year and had not been properly converted to tons in the pre-hearing draft. Additionally, other errors were discovered in converting the annual emissions to typical ozone season weekday emissions. These errors have been corrected in the final submittal. The on-road mobile source emissions were revised to reflect the revised MOVES2010a mobile model. The emission changes between MOVES2010 and MOVES2010a were very minor. The area source emissions inventory was revised for the open burning of municipal waste and small stationary combustion sources. In the pre-hearing draft the open burning of municipal waste emissions were not adjusted to account for the NCDAQ's Open Burning rule 15A NCAC 2D .1900. The emissions have been adjusted similarly to how the emissions for this source category were adjusted in the fine particulate matter redesignation demonstration and maintenance plan submitted in December 2009. For the small stationary combustion sources, the methodology was revised to reflect the current USEPA methodology.

Although the emission estimates presented in the pre-hearing draft have changed significantly in this final submittal, the overall message of the Triad 110(a)(1) maintenance plan has not changed; the emissions in the future years are lower than the base year and continued maintenance is demonstrated.

I respectfully request that you commence the federal approval process for the Section 110(a)(1) Maintenance Plan for the 1997 8-Hour Ozone Standard for Greensboro/Winston-Salem/High Point 1-Hour Ozone Maintenance Area. If you should have any questions, please contact Laura Boothe of my staff at (919) 733-1488 or [laura.boothe@ncdenr.gov](mailto:laura.boothe@ncdenr.gov).

Sincerely,

  
*for* Sheila C. Holman

SCH/lab

Attachment

cc: Michael Abraczinskas  
Laura Boothe  
Dick Schutt  
Lynorae Benjamin